

REMARKS

Claims 2-4, 7-9, 12, 14-16, 18-21, 29-31, 33, 34 and 36-39 were rejected under 35 U.S.C § 103(a) as being unpatentable over Cameron et al. (U.S. Pat. Pub. No. 2003/0004964), hereinafter *Cameron*, and further in view of Krishnaprasad et al. (U.S. Pat. Pub. No. 2002/0078094), hereinafter *Krishnaprasad*. Claim 32 was rejected under 35 U.S.C § 103(a) as being unpatentable over *Cameron* in view of *Krishnaprasad* and further in view of Traversat et al. (U.S. Pat. No. 6,366,954), hereinafter *Traversat*¹.

By this amendment claims 31, 37, 38 and 39 have been amended.² Claim 32 has been cancelled. Accordingly, claims 2-4, 7-9, 12, 14-16, 18-21, 29-31, 33, 34 and 36-39 are pending, of which claims 31, 37, 38 and 39 are the only independent claims at issue.

The claims of the application are generally directed to linking different objects in a database, where the database is a database of a Web service, by defining relationships between different attributes of the different objects. A given defined relationship can be identified by an assigned view name. For example, the Applicant's specification at page 13 paragraphs [0023] and [0024] illustrates an example where a view name "OrgChart" defines an attribute relationship where the attribute of one object is the Manager attribute and the different attribute of a different object is a DirectReports attribute. The assigned view name is then used by a client to request an object in the database. The relationships implicit in the assigned view name can be used to traverse a path to a particular object in the database. For example, Applicant's specification at page 18, paragraph [0030], illustrates an example with a client request, "OrgChart/John/Jane/Alice." Each of the claims further recites that requests are entered in the format of a location path expression as an abbreviated XPath expression, and that a server locates a requested object by converting the abbreviated XPath expression to one or more database queries to locate the requested object in the database. Further, the claims recite that the location path expression is translated into a plurality of LDAP queries that are processed by the Web

¹ Applicant does not acquiesce to the prior art status of the cited art. Indeed applicant reasserts and maintains that Cameron does not qualify as prior art for at least the reasons set forth in the previous Office Action responses. Applicant reserves the right to further challenge the prior art status of any of the references at any appropriate time. Accordingly, any arguments and amendments made herein should not be construed as acquiescing to any prior art status of the cited art.

² Support for the amendments to the claims and for the new claims is found throughout the specification and previously presented claims, including but not limited to claim 32 and paragraph [0029].

service to satisfy the client request and that are iteratively processed until the client request is satisfied. These elements are not shown in the art cited by the Office action.

Claim claims 31 and 37 are server side method and computer program product claims reciting versions of the above limitation. Claims 38 and 39 are client side method and computer program product claims reciting versions of the above limitations.

Applicants respectfully submit that the cited art of record does not anticipate or otherwise render the amended claims unpatentable for at least the reason that the cited art does not disclose, suggest, or enable each and every element of these claims.

35 U.S.C. 102 and 103 Rejections

Each of the independent claims has been amended to include subject matter from now cancelled claim 32 and to recite storing objects in a database, "wherein the database is a database of a Web service," and processing the client request comprising the location path expression by converting the abbreviated XPath expression to one or more database queries to locate the requested object in the database, "wherein the location path expression is translated into a plurality of LDAP queries that are processed by the Web service to satisfy the client request and that are iteratively processed until the client request is satisfied...." none of the cited art teaches or suggests this element.

Claim 32 was rejected as being unpatentable over *Cameron* in view of *Krishnaprasad*, in view of *Traversat*. In particular, the Office Action states that *Traversat* teaches at col. 5, lines 38-42 along with *Cameron* paragraphs [0104] and [0109] "wherein the location path expression is translated into a plurality of LDAP queries that are processed by the web service to satisfy the client request and that are iteratively processed until the client request is satisfied...." *Traversat* at col. 5, lines 38-42 teaches:

"Methods and systems for mapping an attribute or entry in an LDAP directory service to a configuration server schema is described in the various figures. In the described embodiment, the configuration server contains a software component referred to as a Java System Database ("JSD")."

Cameron at 0104 and 0109 teaches:

"[0104] For example, the "and" Boolean modifier 510-3 is used to filter the results of two data store searches based on specific elements-of-interest data fields 510-1. A first specific elements-of-interest data field specifies a surname ("sn") attribute with a value of "Smith". A second specific elements-of-interest data field specifies a "title" attribute with a value of "vice president". Thus, the Boolean modifier is used to narrow, or filter the results based on the respective search results. The result is a single object in the PQL response 620 that corresponds to vice president John Smith. If there were more than one set of entity information stored in a directory that matched this query 500, then each of the entities would be presented in the result."

...

"[0109] FIG. 12 shows the user interface 600 for illustrating a PQL 500 that specifies a filter ("and") 510-3 and a union ("or") 510-3 between two polyarchies 510-4 of data relationships. In this example, the filter and the union are Boolean modifiers. The union attribute is applied to the "management" dimension and the "office location" dimension. The filter specifies a "title" attribute of "architect", which is then applied to the union of the two hierarchies. The search results 620 show the particular objects in the data store that match that query."

However, these cited portions do not appear to teach translating location path expressions into LDAP queries and that LDAP queries are "iteratively processed until the client request is satisfied", as is recited by the claims of the present application. Applicant notes that this feature allows for a client to enter a search in the form of a location path expression, without the need to manually perform the repeated LDAP queries. Rather, the path expression is translated into a plurality of LDAP queries that are iteratively processes. As noted at paragraph [0029] of Applicant's specification, the data path expression can be simple in appearance while the corresponding LDAP queries may be quite complicated. The client does not need to formulate these complicated and iteratively performed LDAP queries, but can rather simply enter a location path expression, where the database engine performs the complex queries on behalf of the client. This is simply not taught or suggested by the cited portions of the references.

In view of the foregoing, Applicant respectfully submits that the other rejections to the claims are now moot and do not, therefore, need to be addressed individually at this time. It will

be appreciated, however, that this should not be construed as Applicant acquiescing to any of the purported teachings or assertions made in the last action regarding the cited art or the pending application, including any official notice. Instead, Applicant reserves the right to challenge any of the purported teachings or assertions made in the last action at any appropriate time in the future, should the need arise. Furthermore, to the extent that the Examiner has relied on any Official Notice, explicitly or implicitly, Applicant specifically requests that the Examiner provide references supporting the teachings officially noticed, as well as the required motivation or suggestion to combine the relied upon notice with the other art of record.

In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney at (801) 533-9800.

Dated this 5th day of May, 2009.

Respectfully submitted,

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